

LAW OFFICES OF

**OMRANI & TAUB, LLP**

488 MADISON AVENUE – 20<sup>th</sup> FLOOR  
 NEW YORK, NEW YORK 10022  
 TEL: (212) 714-1515  
 FAX: (212) 599-5551

**(212) "LAW-SUIT"**

WWW.OMRANITaub.COM  
 WWW.212LAWSUIT.COM

**PARTNERS**

**MICHAEL A. TAUB, ESQ.**  
**ALEX A. OMRANI, ESQ.**  
**ISAAC ARASTEH, ESQ.**

**ASSOCIATE ATTORNEYS**

**JAMES L. FORDE, ESQ.**  
**AVI DAVIDOV, ESQ.**  
**DEAN PAVLOS, ESQ.**  
**JOSEPH LEVY, ESQ.**  
**ANGELA WILLIAMS, ESQ.**  
**MOHAMMED AYOUB, ESQ.**

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October 2, 2024

**VIA ECF:**

Hon. Sarah Netburn  
 United States Courthouse  
 Southern District of New York  
 500 Pearl St.  
 New York, NY 10007-1312

**RE: MOTA et al. v. ARMELLINI EXPRESS LINES, et al.**  
**Case No.: 1:22-cv-02807-SN**  
**Joint Status Report**  
**Motion for Leave to File Motion to Preclude Testimony by Defendant-Driver,**  
**Daniel Hue**

Dear Honorable Netburn:

Please allow this letter to serve as a joint status report on behalf of the parties pursuant to the *Order* dated September 30, 2024 (Doc. No. 46) in the above-referenced matter.

Plaintiffs intend on filing a motion for summary judgment, and as such, Plaintiffs respectfully request leave to file a motion to preclude testimony by the Defendant-driver, Daniel Hue, on the issue of liability and summary judgment based upon such preclusion.

The Plaintiff respectfully request that they be permitted to prepare a formal motion in limine/preclude on papers in connection herewith.

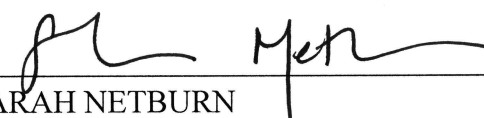
The parties propose the following briefing schedule:

- Motion to preclude/motion for summary judgment to be filed on or before November 1, 2024;
- Opposition, if any, to motion to preclude/motion for summary judgment to be filed on or before November 22, 2024;
- Reply to Opposition to motion to preclude/motion for summary judgment, if any, to be filed on or before November 29, 2024;

Plaintiffs' motion to preclude and motion for summary judgment shall be filed no later than November 1, 2024. Defendants' opposition to both Plaintiffs' motion to preclude and motion for summary judgment shall be filed no later than November 22, 2024. Plaintiffs' reply to Defendants' opposition to the motion to preclude and motion for summary judgment shall be filed no later than November 29, 2024.

**SO ORDERED.**

Dated: October 4, 2024  
 New York, New York

  
 SARAH NETBURN  
 United States Magistrate Judge

cc. via email & ECF:

LAW OFFICES OF LORNE M. REITER, LLC

*Attorneys for Defendants*

14 Wall Street, 20<sup>th</sup> Floor

New York, New York 10005

(212) 222-0955

[Lreiter@leiterlaw.com](mailto:Lreiter@leiterlaw.com)